

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DOCKETED

AUG 22 2001

CHRISTOPHER T. O'NEILL and
P. KEVIN DONAHUE,

Plaintiffs,

v.

CITY OF CHICAGO POLICE OFFICERS
J. O'CALLAGHAN (Star No. 18573) and
L. SYAS (Star No. 19154); and
BUTCH MCGUIRE'S, INC.

Defendants.

01C 6500

No. MAGISTRATE JUDGE ROSEMOND

JURY DEMANDED

JUDGE HOLDERMAN

COMPLAINT

Plaintiffs, Christopher T. O'Neill and P. Kevin Donahue, by and through their attorneys, James E. Dahl and Paul N. Bonadies, state by way of Complaint against defendants, City of Chicago Police Officers J. O'Callaghan (Star No. 18573) and L. Syas (Star No. 19154), and Butch McGuire's, Inc., as follows:

Parties

1. Plaintiff, Christopher T. O'Neill ("O'Neill") is a resident of Portland, Oregon.
2. Plaintiff, P. Kevin Donahue ("Donahue") is, and at all times relevant to this cause of action was, a resident of Cook County, Illinois.
3. Defendant, J. O'Callaghan is, and at times relevant to this cause of action was, a Chicago police officer residing in Cook County, Illinois.
4. Defendant, L. Syas is, and at times relevant to this cause of action was, a Chicago police officer residing in Cook County, Illinois.

5. Defendant, Butch McGuire's, Inc. ("Butch McGuire's") is, and at all times relevant to cause of action was, an Illinois corporation operating a bar and restaurant located in Chicago, Illinois and known as Butch McGuire's Tavern.

Jurisdiction and Venue

6. This action arises under the United States Constitution, particularly under the Fourth and Fourteenth Amendments to the Constitution of the United States and under Federal law, particularly the Civil Rights Act 42 U.S.C. §1983. This Court has jurisdiction in this action pursuant to 28 U.S.C. §§1331 and 1333 and supplemental jurisdiction to hear pendant claims under state law pursuant to 28 U.S.C. §1337(a).

7. This Court is the appropriate venue within which to adjudicate this dispute because the defendants reside in this District and the occurrence at issue occurred in this District.

Background

8. On December 31, 2000, plaintiffs O'Neill and Donahue were sitting at a table at Butch McGuire's Tavern and were accompanied by three friends.

9. While sitting at the table, a waitress brought a beer to the plaintiffs' table. Plaintiff O'Neill informed the waitress that no one had ordered the beer and that no one at the table wanted the beer.

10. The waitress insisted that plaintiff O'Neill pay for the beer and when plaintiff O'Neill informed the waitress that he was not going to pay for the beer, the waitress ushered a bouncer to the table, who was employed by defendant Butch McGuire's, to try to resolve the situation.

11. The bouncer brought defendant O'Callaghan to the table and at that time, plaintiff O'Neill explained to defendant O'Callaghan that no one at the table had ordered the beer and that no one wanted the beer.

12. Defendant O'Callaghan then told plaintiff O'Neill that he should walk outside the bar to discuss the situation further. Plaintiffs O'Neill and Donahue walked outside of defendant Butch McGuire's and as soon as plaintiff O'Neill was outside of the bar, defendants O'Callaghan and Syas threw O'Neill against the window of Butch McGuire's, violently handcuffed him, searched his person and arrested plaintiff O'Neill.

13. When plaintiff Donahue asked defendant O'Callaghan why plaintiff O'Neill was being arrested, defendant O'Callaghan told plaintiff Donahue to step inside Butch McGuire's and he would explain.

14. As soon as plaintiff Donahue stepped inside defendant Butch McGuire's, plaintiff Donahue was arrested by defendants O'Callaghan and Syas.

15. At no time did either plaintiff O'Neill or plaintiff Donahue violate any federal, state or municipal statute.

16. The defendants, O'Callaghan and Syas, arrested the plaintiffs without probable cause and without an arrest warrant and charged the plaintiffs with criminal trespass.

17. Defendants O'Callaghan and Syas were at all times relevant to this action, officers, employees and/or agents of the Chicago Police Department, acting under color of law, under color of statutes, ordinances, regulations, policies, customs and usages of the State of Illinois and/or the City of Chicago and/or the Chicago Police Department.

18. The plaintiffs spent the entire evening in jail and the next day, the criminal proceedings against the plaintiffs were terminated in their favor.

COUNT I

O'NEILL v. O'CALLAGHAN AND SYAS

VIOLATION OF CIVIL RIGHTS

1-18. Plaintiff O'Neill realleges paragraphs 1 through 18 above as paragraphs 1 through 18 of this Count I.

19. As a direct and proximate result of the actions of defendants O'Callaghan and Syas, plaintiff O'Neill suffered the following injuries and damages:

a. violation of his constitutional rights under the Fourth and Fourteenth Amendments to the Constitution of the United States of America to be free from unreasonable search and seizure, the right to due process and equal protection under the laws;

b. deprivation of physical liberty;

c. physical pain and suffering and emotional trauma, distress and suffering arising from the arrest, incarceration and criminal charge.

20. Defendants O'Callaghan's and Syas' misconduct was the proximate cause of the violation of plaintiff O'Neill's Fourth and Fourteenth Amendment rights under the U.S. Constitution when they unreasonably searched, seized and arrested O'Neill without probable cause.

21. Defendants O'Callaghan and Syas violated plaintiff O'Neill's U.S. Constitution Fourteenth Amendment rights by depriving him of his liberty without due

process of law and denying his protection of the laws by arresting him and by causing false criminal charges to be brought against him.

WHEREFORE, plaintiff, Christopher T. O'Neill, respectfully requests this Court to enter judgment in his favor and against defendants, J. O'Callaghan and L. Syas, jointly and severally, in an amount greater than \$75,000 plus attorney's fees and costs pursuant to 42 U.S.C. §1988, punitive damages and such other relief as this Court deems appropriate.

COUNT II

DONAHUE v. O'CALLAGHAN AND SYAS

VIOLATION OF CIVIL RIGHTS

1-18. Plaintiff Donahue realleges paragraphs 1 through 18 of Count I as paragraphs 1 through 18 of this Count II.

19. As a direct and proximate result of the actions of defendants O'Callaghan and Syas, plaintiff Donahue suffered the following injuries and damages:

a. violation of his constitutional rights under the Fourth and Fourteenth Amendments to the Constitution of the United States of America to be free from unreasonable search and seizure, the right to due process and equal protection under the laws;

b. deprivation of physical liberty;

c. physical pain and suffering and emotional trauma, distress and suffering arising from the arrest, incarceration and criminal charge.

20. Defendants O'Callaghan's and Syas' misconduct was the proximate cause of the violation of plaintiff Donahue 's Fourth and Fourteenth Amendment rights under the U.S. Constitution when they unreasonably searched, seized and arrested Donahue without probable cause.

21. Defendants O'Callaghan and Syas violated plaintiff Donahue's Constitution Fourteenth Amendment rights by depriving him of his liberty without due process of law and denying his protection of the laws by arresting the plaintiff and by causing false criminal charges to be brought against Donahue.

WHEREFORE, plaintiff, P. Kevin Donahue, respectfully requests this Court to enter judgment in his favor and against defendants, J. O'Callaghan and L. Syas, jointly and severally, in an amount greater than \$75,000 plus attorney's fees and costs pursuant to 42 U.S.C. §1988, punitive damages and such other relief as this Court deems appropriate.

COUNT III

O'NEILL v. O'CALLAGHAN AND SYAS

MALICIOUS PROSECUTION

1-18. Plaintiff O'Neill realleges paragraphs 1 through 18 of Count I as paragraphs 1 through 18 of this Count III.

19. Defendants O'Callaghan and Syas, willfully and wantonly, falsely accused plaintiff O'Neill of criminal trespass and then intentionally, falsely detained, arrested and imprisoned plaintiff O'Neill against his will.

20. As a direct and proximate result of the aforementioned conduct, plaintiff O'Neill was exposed to public disgrace, physical harm, humiliation, mental anguish, emotional harm and incurred expenses in defending the false charges of criminal trespass.

21. By virtue of defendant O'Callaghan's and Syas' intentional conduct, defendants O'Callaghan and Syas are subject to punitive damages.

WHEREFORE, plaintiff, Christopher T. O'Neill, respectfully requests this Court to enter judgment in his favor and against defendants, J. O'Callaghan and L. Syas, jointly and severally, in an amount greater than \$75,000 plus attorney's fees, costs and punitive damages.

COUNT IV

DONAHUE v. O'CALLAGHAN AND SYAS

MALICIOUS PROSECUTION

1-18. Plaintiff Donahue realleges paragraphs 1 through 18 of Count I as paragraphs 1 through 18 of this Count IV.

19. Defendants O'Callaghan and Syas, willfully and wantonly, falsely accused plaintiff Donahue of criminal trespass and then intentionally, falsely detained, arrested and imprisoned plaintiff Donahue against his will.

20. As a direct and proximate result of the aforementioned conduct, plaintiff Donahue was exposed to public disgrace, physical harm, humiliation, mental anguish, emotional harm and incurred expenses in defending the false charges of criminal trespass.

21. By virtue of defendants O'Callaghan's and Syas' intentional conduct, defendants O'Callaghan and Syas are subject to punitive damages.

WHEREFORE, plaintiff, P. Kevin Donahue, respectfully requests this Court to enter judgment in his favor and against defendants, J. O'Callaghan and L. Syas, jointly and severally, in an amount greater than \$75,000 plus attorney's fees, costs and punitive damages.

COUNT V

O'NEILL v. O'CALLAGHAN AND SYAS

FALSE ARREST AND FALSE IMPRISONMENT

1-18. Plaintiff O'Neill realleges paragraphs 1 through 18 of Count I as paragraphs 1 through 18 of this Count V.

19. Plaintiff O'Neill was arrested, restrained and imprisoned without any probable cause that he committed any sort of criminal offense.

20. Defendants O'Callaghan's and Syas' actions were willful and wanton in that they were meant to intimidate, harass and disgrace plaintiff O'Neill.

21. As a direct and proximate result of the aforementioned conduct of defendants O'Callaghan and Syas, plaintiff O'Neill was humiliated, suffered bodily injury, mental anguish and incurred expenses to defend the unjustified charges brought against him.

22. By virtue of defendants O'Callaghan's and Syas' intentional actions, defendants O'Callaghan's and Syas' are subject to punitive damages.

WHEREFORE, plaintiff, Christopher T. O'Neill, respectfully requests this Court to enter judgment in his favor and against defendants, J. O'Callaghan and L. Syas, jointly and severally, in an amount greater than \$75,000 plus attorney's fees, costs and punitive damages.

COUNT VI

DONAHUE v. O'CALLAGHAN AND SYAS
FALSE ARREST AND FALSE IMPRISONMENT

1-18. Plaintiff Donahue realleges paragraphs 1 through 18 of Count I as paragraphs 1 through 18 of this Count VI.

19. Plaintiff Donahue was arrested, restrained and imprisoned without any probable cause that he committed any sort of criminal offense.

20. Defendants O'Callaghan's and Syas' actions were willful and wanton in that they were meant to intimidate, harass and disgrace plaintiff Donahue.

21. As a direct and proximate result of the aforementioned conduct of defendants O'Callaghan and Syas, plaintiff Donahue was humiliated, suffered bodily injury, mental anguish and incurred expenses to defend the unjustified charges brought against him.

22. By virtue of defendants O'Callaghan's and Syas' intentional actions, defendants O'Callaghan and Syas are subject to punitive damages.

WHEREFORE, plaintiff, P. Kevin Donahue, respectfully requests this Court to enter judgment in his favor and against defendants, J. O'Callaghan and L. Syas, jointly

and severally, in an amount greater than \$75,000 plus attorney's fees, costs and punitive damages.

COUNT VII

O'NEILL v. BUTCH MCGUIRE'S

MALICIOUS PROSECUTION

1-18. Plaintiff O'Neill realleges paragraphs 1 through 18 of Count I as paragraphs 1 through 18 of this Count VII.

19. Plaintiff O'Neill, was a patron of Butch McGuire's Tavern which was owned and operated by defendant Butch McGuire's, Inc.

20. The bouncers for Butch McGuire's Tavern were employed by defendant Butch McGuire's.

21. Defendant, Butch McGuire's, by and through its employees, willfully and wantonly falsely accused plaintiff O'Neill of criminal trespass and in a willful and wanton manner allowed for plaintiff O'Neill to be falsely detained, arrested and imprisoned against his will.

22. As a direct and proximate result of the aforementioned detention, arrest and imprisonment of plaintiff O'Neill, plaintiff O'Neill was exposed to humiliation, mental anguish, bodily harm and was forced to incur the expense of defending unjustified criminal charges that were brought against him.

23. By reason of Butch McGuire's, Inc.'s willful and wanton conduct, Butch McGuire's is subject to punitive damages.

WHEREFORE, plaintiff, Christopher T. O'Neill, respectfully requests this Court to enter judgment in his favor and against defendant, Butch McGuire's, Inc., in an amount greater than \$75,000 plus attorney's fees, costs and punitive damages.

COUNT VIII

DONAHUE v. BUTCH MCGUIRE'S

MALICIOUS PROSECUTION

1-18. Plaintiff Donahue realleges paragraphs 1 through 18 of Count I as paragraphs 1 through 18 of this Count VIII.

19. Plaintiff Donahue, was a patron of Butch McGuire's Tavern which was owned and operated by defendant Butch McGuire's, Inc.

20. The bouncers for Butch McGuire's Tavern were employed by defendant Butch McGuire's.

21. Defendant, Butch McGuire's, by and through its employees, willfully and wantonly falsely accused plaintiff Donahue of criminal trespass and in a willful and wanton manner allowed for plaintiff Donahue to be falsely detained, arrested and imprisoned against his will.

22. As a direct and proximate result of the aforementioned detention, arrest and imprisonment of plaintiff Donahue, plaintiff Donahue was exposed to humiliation, mental anguish, bodily harm and was forced to incur the expense of defending unjustified criminal charges that were brought against him.

23. By reason of Butch McGuire's, Inc.'s willful and wanton conduct, Butch McGuire's is subject to punitive damages.

WHEREFORE, plaintiff, P. Kevin Donahue, respectfully requests this Court to enter judgment in his favor and against defendant, Butch McGuire's, Inc., in an amount greater than \$75,000 plus attorney's fees, costs and punitive damages.

COUNT IX

O'NEILL v. BUTCH MCGUIRE'S

FALSE ARREST AND FALSE IMPRISONMENT

1-18. Plaintiff O'Neill realleges paragraphs 1 through 18 of Count I as paragraphs 1 through 18 of this Count IX.

19. Defendant, Butch McGuire's, by and through its employees, maliciously intended to injure, humiliate and disgrace plaintiff O'Neill by causing him to be arrested and imprisoned by directing defendants O'Callaghan and Syas to arrest plaintiff O'Neill without probable cause and charging O'Neill with the crime of criminal trespass.

20. As a direct and proximate result of the detention, arrest and imprisonment which was directed by Butch McGuire's, plaintiff O'Neill was humiliated, incurred mental anguish, bodily injury, and incurred costs to defend and establish his innocence with respect to the false charge of criminal trespass.

21. As a direct and proximate result of defendant Butch McGuire's conduct, Butch McGuire's is subject to punitive damages.

WHEREFORE, plaintiff, Christopher T. O'Neill, respectfully requests this Court to enter judgment in his favor and against defendant, Butch McGuire's, Inc., in an amount greater than \$75,000 plus attorney's fees, costs and punitive damages.

COUNT X

DONAHUE v. BUTCH MCGUIRE'S

FALSE ARREST AND FALSE IMPRISONMENT

1-18. Plaintiff Donahue realleges paragraphs 1 through 18 of Count I as paragraphs 1 through 18 of this Count X.

19. Defendant, Butch McGuire's, by and through its employees, maliciously intended to injure, humiliate and disgrace defendant Donahue by causing him to be arrested and imprisoned by directing defendants O'Callaghan and Syas to arrest plaintiff Donahue without probable cause and charging Donahue with the crime of criminal trespass.

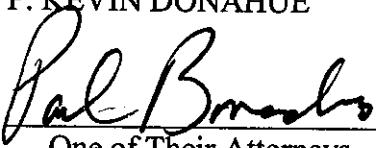
20. As a direct and proximate result of the detention, arrest and imprisonment which was directed by Butch McGuire's, plaintiff Donahue was humiliated, incurred mental anguish, bodily injury, and incurred costs to defend and establish his innocence with respect to the false charge of criminal trespass.

21. As a direct and proximate result of defendant Butch McGuire's conduct, Butch McGuire's is subject to punitive damages.

WHEREFORE, plaintiff, P. Kevin Donahue, respectfully requests this Court to enter judgment in his favor and against defendant, Butch McGuire's, Inc., in an amount greater than \$75,000 plus attorney's fees, costs and punitive damages.

JAMES E. DAHL (0568724)
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225 West Washington Street, Suite 1125
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CHRISTOPHER T. O'NEILL
and P. KEVIN DONAHUE

By: 
One of Their Attorneys

JS 44

(Rev. 12/96)

Cat 2

CIVIL COVER SHEET

01C

6500

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

Christopher T. O'Neill and
P. Kevin Donahue

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF Portland, Oregon
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

James E. Dahl & Associates
225 West Washington St., #1125
Chicago, IL 60606

II. BASIS OF JURISDICTION

(PLACE AN "X" IN ONE BOX ONLY)

- 1 U.S. Government Plaintiff
 2 U.S. Government Defendant

- 3 Federal Question
(U.S. Government Not a Party)
 4 Diversity
(Indicate Citizenship of Parties in Item III)

IV. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

- 1 Original Proceeding
 2 Removed from State Court

- 3 Remanded from Appellate Court

- 4 Reinstated or Reopened

Transferred from
 5 another district
(specify)

- 6 Multidistrict Litigation

Appeal to District Judge from
 7 Magistrate Judgment

V. NATURE OF SUIT

(PLACE AN "X" IN ONE BOX ONLY)

CONTRACT**TORTS****FORFEITURE/PENALTY****BANKRUPTCY****OTHER STATUTES**

- 110 Insurance
 120 Marine
 130 Miller Act
 140 Negotiable Instrument
 150 Recovery of Overpayment & Enforcement of Judgment
 151 Medicare Act
 152 Recovery of Defaulted Student Loans (Excl. Veterans)
 153 Recovery of Overpayment of Veteran's Benefits
 160 Stockholders' Suits
 190 Other Contract
 195 Contract Product Liability

- PERSONAL INJURY**
 310 Airplane
 315 Airplane Product Liability
 320 Assault, Libel & Slander
 330 Federal Employers' Liability
 340 Marine
 345 Marine Product Liability
 350 Motor Vehicle
 355 Motor Vehicle Product Liability
 360 Other Personal Injury

- PERSONAL INJURY**
 362 Personal Injury - Med. Malpractice
 365 Personal Injury - Product Liability
 368 Asbestos Personal Injury Product Liability
- PERSONAL PROPERTY**
 370 Other Fraud
 371 Truth in Lending
 380 Other Personal Property Damage
 385 Property Damage Product Liability

- 610 Agriculture
 620 Other Food & Drug
 625 Drug Related Seizure of Property 21 USC 881
 630 Liquor Laws
 640 R.R. & Truck
 650 Airline Regs.
 660 Occupational Safety/Health
 690 Other

- 422 Appeal 28 USC 158
 423 Withdrawal 28 USC 157
- PROPERTY RIGHTS**
 820 Copyrights
 830 Patent
 840 Trademark
- LABOR**
 710 Fair Labor Standards Act

- 861 HIA (1395ff)
 862 Black Lung (923)
 863 DIWC/DIW (405(g))
 864 SSID Title XVI
 865 IRS (405(g))
- SOCIAL SECURITY**
 720 Labor/Mgmt. Relations

- 730 Labor/Mgmt. Reporting & Disclosure Act
 740 Railway Labor Act
 790 Other Labor Litigation
- FEDERAL TAX SUITS**
 780 Taxes (U.S. Plaintiff or Defendant)
 871 IRS - Third Party 26 USC 7609

REAL PROPERTY**CIVIL RIGHTS****PRISONER PETITIONS**

- 210 Land Condemnation
 220 Foreclosure
 230 Rent Lease & Ejectment
 240 Torts to Land
 245 Tort Product Liability
 290 All Other Real Property

- 441 Voting
 442 Employment
 443 Housing/ Accommodations
 444 Welfare
 440 Other Civil Rights

- 510 Motions to Vacate Sentence
HABEAS CORPUS:
 530 General
 535 Death Penalty
 540 Mandamus & Other
 550 CML Rights
 555 Prison Condition

VI. CAUSE OF ACTION(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE BRIEF STATEMENT OF CAUSE.
DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY.)

Violation of civil rights action pursuant to 42 U.S.C. §1983; malicious prosecution, false arrest, false imprisonment.

VII. REQUESTED IN COMPLAINTCHECK IF THIS IS A CLASS ACTION
 UNDER F.R.C.P. 23DEMAND \$ greater than CHECK YES only if demanded in complaint
\$75,000.00 JURY DEMAND: YES NO

VIII. This case

 is not a refiling of a previously dismissed action. is a refiling of case number _____, previously dismissed by Judge _____

DATE

SIGNATURE OF ATTORNEY OF RECORD

August 21, 2001

Paul Bonds

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

DOCKETED

AUG 22 2001

01C 6500

Case Number:
MAGISTRATE JUDGE ROSEMOND

In the Matter of

Christopher T. O'Neill and P. Kevin Donahue,
v.City of Chicago Police Officers J. O'Callaghan
(star No. 18573) and L. Syas (Star No. 19154);
and Butch McGuire's, Inc.

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR: Plaintiffs

CHRISTOPHER T. O'NEILL and P. KEVIN DONAHUE

JUDGE HOLDERMAN

FILED - 08/22/01 PM 3:35
U.S. DISTRICT COURT
ILLINOIS

(A)		(B)				
SIGNATURE	SIGNATURE					
NAME	NAME					
James E. Dahl	Paul N. Bonadies					
FIRM	FIRM					
JAMES E. DAHL & ASSOCIATES	JAMES E. DAHL & ASSOCIATES					
STREET ADDRESS	STREET ADDRESS					
225 West Washington St., Suite 1125	225 West Washington St., Suite 1125					
CITY/STATE/ZIP	CITY/STATE/ZIP					
Chicago, IL 60606	Chicago, IL 60606					
TELEPHONE NUMBER	FAX NUMBER	TELEPHONE NUMBER	FAX NUMBER			
312/641-3245	312/641-1662	312/641-3245	312/641-1662			
E-MAIL ADDRESS	E-MAIL ADDRESS					
Dahlfirm @ aol.com	Dahlfirm @ aol.com					
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)					
0568724	6206589					
MEMBER OF TRIAL BAR?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	MEMBER OF TRIAL BAR?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	
TRIAL ATTORNEY?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	TRIAL ATTORNEY?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	
				DESIGNATED AS LOCAL COUNSEL?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
(C)		(D)				
SIGNATURE	SIGNATURE					
NAME	NAME					
FIRM	FIRM					
STREET ADDRESS	STREET ADDRESS					
CITY/STATE/ZIP	CITY/STATE/ZIP					
TELEPHONE NUMBER	FAX NUMBER	TELEPHONE NUMBER	FAX NUMBER			
E-MAIL ADDRESS	E-MAIL ADDRESS					
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)					
MEMBER OF TRIAL BAR?	YES <input type="checkbox"/>	NO <input type="checkbox"/>	MEMBER OF TRIAL BAR?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	
TRIAL ATTORNEY?	YES <input type="checkbox"/>	NO <input type="checkbox"/>	TRIAL ATTORNEY?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	
DESIGNATED AS LOCAL COUNSEL?	YES <input type="checkbox"/>	NO <input type="checkbox"/>	DESIGNATED AS LOCAL COUNSEL?	YES <input type="checkbox"/>	NO <input type="checkbox"/>	